

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiffs

vs.

AGENTRA, LLC, ANGELIC
MARKETING GROUP L.L.C., and
MATTHEW JONES

Defendants.

Case No. 18-cv-615-PLD

PLAINTIFFS' RESPONSE TO MONICA ABOUD'S MOTION TO INTERVENE

Plaintiffs Stewart Abramson and James Everett Shelton ("Plaintiffs") file this response in opposition to the Plaintiff-Intervenor Monica Abboud's Motion to Intervene. The Plaintiffs adopt the arguments made in Agentra, LLC's response. *See* ECF No. 136.

The Plaintiffs would add that with respect to the timeliness factor, Ms. Abboud admits that she was aware of the present action for nearly a year. *See* ECF No. 129 at 2. However, Ms. Aboud has been aware of this claim for long before that. Indeed, while the Plaintiffs' claim was pending in this action counsel were contacted in *November of 2018* regarding Ms. Aboud's claim by an attorney representing her. *See Exhibit 1*, Declaration of Anthony Paronich at ¶ 3. Class Counsel informed counsel for Ms. Aboud that they had a pending action at that time. *Id.* at ¶ 4.

Class Counsel are also adequate to represent Ms. Aboud's interests. Indeed, Ms. Aboud believes so herself as *she has retained Class Counsel* in other TCPA litigation. *See Abboud v. Sunder Energy LLC*, Civil Action No. 4:20-cv-03076 (S.D. Tex.). Furthermore, any assertion that the Plaintiffs engaged in a "reverse auction" of a claim filed well in advance of Ms. Aboud, which Ms. Aboud filed with actual knowledge of the pending litigation, is preposterous. The absurdity of that notion is highlighted by the fact that Agentra *opposed the motion for settlement*. *See* ECF No. 115. It was only after a motion was filed and an evidentiary hearing was held that this Court Ordered enforcement of the settlement.

WHEREFORE, the Plaintiffs request that Ms. Aboud's motion be denied.

Respectfully submitted,

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Class*

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to all counsel of record.

/s/ Anthony I. Paronich
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